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BY ECF

Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Allstate Ins. Co., et al., v. Mirvis, et al.*, (08-CV-4405): Letter Regarding
Mirvis Retention of Counsel in *Allstate Ins. Co., et al., v. Khotenok, et al.*,**

Dear Judge Chen:

We submit this letter to respond to Plaintiffs' letter dated January 21, 2020 at ECF No. 674 to clarify Plaintiff's assertion regarding the undersigned's representation of Mark Mirvis in a subsequent lawsuit filed against Mr. Mirvis by Plaintiffs.

In footnote 5 of their filing, Plaintiffs assert that Mr. Mirvis's status as a *pro se* defendant in this action is notable because this firm, which represents non-Parties Tatyana Mirvis, Lyubov Mirvis, and Alexander Boriskin in this matter, also represents Mr. Mirvis in *Allstate Ins. Co. v. Khotenok*, 18-cv-5650 (JBW)(RER) in this District. ECF No. 674. This firm essentially represents and has represented Mr. Mirvis in *Khotenok* on a *pro bono* basis.

Mr. Mirvis retained the undersigned in *Khotenok* on or about December 10, 2018 and paid a small retainer to the undersigned in exchange for representation. Since that time, counsel's representation of Mr. Mirvis has become *pro bono*. Mr. Mirvis has made no additional payments to counsel despite counsel's active participation in that matter and exhausted his retainer in *Khotenok* in the early summer of 2019. Counsel and Mr. Mirvis have since agreed to continue this *pro bono* representation for the foreseeable future because Mr. Mirvis is otherwise unable to afford representation.

Thank you for your consideration of this letter.

Respectfully,

/s/ _____

Gary Tsirelman, Esq.
Counsel for Lyubov Mirvis,
Tatyana Mirvis, and Alexander
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Cc: All Counsel via ECF

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